

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6276-CR-FERGUSON

UNITED STATES OF AMERICA, :

Plaintiff, :

v. :

EVEROL PRINGLE, :

Defendant. :

_____ :

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CLERK OF COURT
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH, FLORIDA

MOTION TO CONTINUE TRIAL

Defendant, Everol Pringle, through counsel, respectfully moves for a continuance of the trial in this matter by a period of at least two weeks, from the currently scheduled trial period beginning May 21, 2001, and in support states as follows:

1. Defendant was arraigned in this matter on April 17, 2001. This case is currently set for trial during the two week period beginning May 21, 2001. This is the first trial setting in this matter.

2. Counsel has received the government's written discovery response, and has reviewed it with Mr. Pringle. It is very likely that this case will be resolved by way of plea. However, counsel has run into difficulty verifying Defendant's criminal history from before his deportation. This criminal history will have a significant impact on the sentencing range for Mr. Pringle, and could have an impact on his decision to enter a plea. Counsel is currently awaiting a response from an investigator in Connecticut regarding prior history. Once this information is received and verified,

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this case should be ready to proceed.

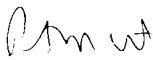
3. Mr. Pringle is incarcerated, but he concurs in the requested continuance.

4. Counsel attempted to contact Laurie Rucobo, the Assistant United States Attorney handling this matter for the government, in order to ascertain the government's position with respect to the granting of the relief requested herein, but was unable to do so.

WHEREFORE, the Defendant Everol Pringle, through undersigned counsel, respectfully requests that the trial in this cause be continued by a period of at least two weeks.

Respectfully submitted,

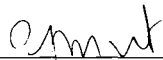
KATHLEEN M. WILLIAMS
FEDERAL PUBLIC DEFENDER

By: 

Patrick M. Hunt
Assistant
Federal Public Defender
Florida Bar No. 571962
Attorney for Defendant
One East Broward Blvd., Suite 1100
Fort Lauderdale, Florida 33301
(954) 356-7436 / (Fax) 356-7556

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the aforementioned motion was mailed on this 14th day of May, 2001, to Assistant United States Attorney Laurie Rucobo at 299 E. Broward Blvd. Fort Lauderdale, Florida, 33301.


Patrick M. Hunt